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Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ERIC GOODMAN
IN SUPPORT OF REPLY IN SUPPORT
OF OMNIBUS OBJECTION TO NO
LIABILITY CLAIMS FILED BY THE
DEPARTMENT OF HOMELAND
SECURITY / FEDERAL EMERGENCY
MANAGEMENT AGENCY**

Eric Goodman declares as follows under penalty of perjury:

1. I am a Partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort Claimants (the "TCC") in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company. I have personal knowledge of the facts stated herein except as to matters where I indicate otherwise, and as to those matters, I believe them to be true. If called upon to testify, I could and would competently do so.


2. I make this declaration in support of the TCC's *Reply in Support of Omnibus Objection to No Liability Claims Filed by the Department of Homeland Security / Federal Emergency Management Agency* (the "Reply") filed concurrently herewith.

3. For the Court's reference in its consideration of the Reply, attached hereto as **Exhibit 1** through **Exhibit 7** are true and accurate copies of the discovery requests, discovery response, deposition transcript, and news article referenced in the Reply:

1	<i>Transcript of Videotaped Deposition of John-Paul Henderson (FEMA Rule 30(b)(6) Designee)</i> , taken February 11, 2020.
2	<i>Official Committee of Tort Claimants' First Set of Requests for Admission to Department of Homeland Security / Federal Emergency Management Agency</i> , dated December 19, 2019.
3	<i>Official Committee of Tort Claimants' First Set of Interrogatories to Department of Homeland Security / Federal Emergency Management Agency</i> , dated December 19, 2019.
4	<i>United States' Response to Official Committee of Tort Claimants' First Set of Interrogatories</i> , dated January 21, 2020.
5	J.D. Morris, <i>FEMA Says It May Bill Fire Victims If It Can't Get \$4 Billion from PG&E</i> , San Francisco Chronicle, January 20, 2020.
6	Julie Johnson, <i>Federal Lawmakers Tell FEMA to Drop Bid for Billions Out of PG&E's Settlement with Wildfire Victims</i> , Press Democrat, January 11, 2020.
7	Federal Government Blasts PG&E's Deal with Fire Victims, New York Times, January 14, 2020.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of February 2020, at Cleveland, Ohio.


Eric Goodman